

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	Case No.	15-11296-TPA
NICHOLS, KIMBERLY G.	Chapter 7	
Debtor		
	Document #	
TAMERA OCHS ROTHSCHILD	Related Document #	
Movant		
v.	Hearing Date and Time:	November 2,
University of Michigan Credit		2017 at 11:00 a.m.
Union		
Respondents	Objection Date:	October 19, 2017

TRUSTEE'S OBJECTION TO CLAIM

NOW COMES, Tamera Ochs Rothschild, Chapter 7 Trustee for the above-named Debtor(s), and objects to claims of Respondents for the following reasons:

1. Jurisdiction is found under 28 U.S.C. Sec. 1334. This is a core matter under 28 U.S.C. Sec. 157.
2. On 12/07/15, an order for relief under Chapter 7 of the Bankruptcy Code was entered in this case.
3. Movant is the duly qualified and acting Chapter 7 Trustee.
4. All creditors were required to file proofs of claim on or before June 1, 2016.

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5. The following Respondent's claim is objected to for the following reasons:

Claim No.	Claimant Name	Amount Filed	Reason
9	University of Michigan Credit Union Attn: Suzanne M. Roberts, Esq. PO Box 56 Sewickley, PA 15143 University of Michigan Credit Union 333 E William St. Ann Arbor, MI 48104	\$18,243.73	This claim is filed as a secured claim based on a mortgage against real estate in Michigan and a judgment entered in Pennsylvania against the Debtor. Debtor has no real estate interests in Pennsylvania to which this judgement attaches, and no levy has been issued on the judgement. Trustee objects to treating the claim as secured absent documents establishing secured status. Trustee proposes to treat this claim as unsecured and anticipates it will be paid over 90%.

WHEREFORE, Trustee requests this court for an order as follows:

1. Claim No. 9 filed by University of Michigan Credit Union is disallowed as a secured claim and allowed as an unsecured claim.

The Trustee does not intend to file a brief in connection with this motion but reserves the right to file a responsive brief if necessary.

Dated September 19, 2017

/s / Tamera Ochs Rothschild, Trustee

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